Mary Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

February 14, 2005

Re: Massachusetts Electric Company and Nantucket Electric Company, D.T.E. 05-2

Dear Secretary Cottrell:

On January 18, 2005, pursuant to G.L. c. 164, § 1A(a), and 220 C.M.R. § 11.03(4), Massachusetts Electric Company and Nantucket Electric Company("MECo" or "Company") filed with the Department of Telecommunications and Energy ("Department") their 2004 reconciliation filing. The filing incorporates several rate change proposals to be effective on March 1, 2005. On February 3, 2005, the Department issued an order of notice requesting comments by February 14, 2005. Pursuant to that notice, the Attorney General submits this letter as his Initial Comments.

MECo seeks approval of rates that will change its average standard offer service rates. The Company proposes the following:

- -an average transition charge of \$.00855/kWh;
- -an average transmission charge \$.00722587/kWh; and,
- -a default service adjustment credit of \$0.00017/kWh.

The Attorney General requests that the Department initiate a formal investigation into the Company's proposed reconciliation as it has for all the Company's prior filings. "[T]he Department must ensure that the proposed reconciliations are consistent with or substantially comply with the Electric Utility restructuring Act, Chapter 164 of the Acts of 1997 ("Act") the Company's approved restructuring plan, applicable law, and Department precedent." *Boston Edison Company*, D.T.E. 98-111, p. 4 (October 19, 1999). *See Boston Edison Company*, D.T.E. 98-111 (December 31, 1998); *Boston Edison Company*, D.T.E. 99-107 (January 4, 2000).

Sincerely,

Alexander J. Cochis Assistant Attorney General, Utilities Division

cc: Service List